

Strategy For Closure of RCRA Units at Proteco

Units that must close under RCRA:

1, 2, 3, 4, 5, 7, 9, 10, 11, 12, 13, 15, 16, and 17

(Note: Units 6, 8, and 14 are not RCRA units.)

Sequence of closure:

This is a reasonable sequence for closure of all the RCRA units. Steps 1 and 2 are considered the highest priority due to the deteriorating conditions at the drum storage area and the existing liquid waste content in the oil lagoon and neutralization unit (a surface impoundment).

1. Unit #4 (Drum Removal portion only)
2. Units #7 and 9 (Treatment of liquids in Neutralization Unit and Oil Lagoon)
3. Units #1, 2, 3, 4, 5, and 7 -- These are distinct units and may be closed independent of the other units.

Units #9, 10, 11 -- These are adjacent units and will be closed as one capped unit.

Units #12 and 16 -- These are adjacent units and will be closed as one capped unit.

Units #13, 15, and 17 -- These are adjacent units and will be closed as one capped unit.

Proposed Strategy

- Have Proteco commit as much of its own funding as possible before allowing the use of the funds in the penalty escrow fund and the closure trust fund.
- If funding is quickly depleting, we can allow flexibility in the length of time for completing Steps #1 and #3. The high risk potential of the deteriorating Unit #4, the Drum Storage Area, should be reasonably managed during first 3 months of implementation of Step #1, therefore extending the drum removal activity is acceptable. Step #2, treatment of waste content in Oil Lagoon should not be post-poned.

Closure Cost Estimate Breakdown:

These estimates includes cost for site preparation, engineering, and contingency (15% of total construction cost).

◦ Unit #4 (Existing Drum Storage Area)--	\$500,000
1000 drums must be removed.	
◦ Unit #1 (Drum Burial Site 1)--	\$50,000
0.31 acre	
◦ Unit #2 (Drum burial Site 2)--	\$10,000
0.06 acre	
◦ Unit #3 (Drum Burial Site 3)--	\$40,000
0.26 acre	
◦ Unit #5 (Drum Burial Site 5)--	\$32,000
0.2 acre	
◦ Unit #4 (Soils after Drum removal)--	\$10,000
◦ Unit #9 (Treatment of Liquids--Oil Lagoon)--	\$200,000
◦ 1.4 million gallons, 50% to 60 % is water	
◦ Organic fraction consists of toluene (1.6 ppm), benzene (2.4 ppm), and aromatic.	
◦ Unit #7 (Treatment of Neutralization Imp.)--	\$12,000
393,000 gallons	
◦ Unit #7 (after treatment)--	\$45,000
◦ Unit #10, 11 (Immobilization Units), 9--	\$637,000
3.4 acres	
◦ Units #12 (Land Treatment Unit) and 16 (Immobilization Unit)--	\$480,000
3 acres	
◦ Unit #13 (Rainwater Lagoon), 15 (Old Tank), and 17 (Neutralization Impoundment)	\$640,000
4 acres	
TOTAL:	\$2,656,000

Corrective Action

Corrective action will consist of the closure activities and completion of hydrogeologic assessment and possible ground water remediation if determined to be needed. The cost estimate for developing an adequate ground water monitoring system and conducting one year's worth of monitoring is approximately \$120,000. The cost estimate, on a monthly basis for 12 months, would be approximately \$12,000 per month.

We consider implementation of closure to be the top priority, with ground water monitoring to be addressed soon afterward. Proteco will also be required to obtain a post-closure permit because they are closing the land disposal units with waste in-place.

There is evidence of ground water contamination. (However, the impacted ground water does not appear to be mobile.) Based on recent assessment of existing GW monitoring system, the monitoring system appears to be inadequate due to inadequate background wells. It should also be noted that characterizing the hydrology of the site is difficult due to the dry climate of the region.

Available Funding for Closure at Proteco

CIVIL PENALTY: (Pursuant to 10/14/87 Consent Decree)

\$850,000 plus interest (7.5% per year, compounded quarterly)

Penalty still owed: \$261,581.15

FUNDING

° Operating Revenues*:

\$300,000 (to be used for drum removal)

\$600,000 (to be used for remaining closure activities)

Assumption: Operating revenues for payment of penalty and closure activities will be deposited into the escrow account, which bears an interest of 3.5%, compounded monthly.

° Current Balance in Penalty Escrow Account: \$529,700.89

° Closure Trust Fund: \$268,000.00

Closure Cost Estimate and Funding

1. Drum Removal:

\$500,000 (to be funded by operating revenue only)

2. Oil Lagoon and Neutralization Unit (Treatment Only):

\$212,000 (to be funded by the penalty escrow account)

3. 4 Drum Burial Areas:

\$132,000 (to be funded by the penalty escrow account)

4. Remaining Units

\$1,812,000 (to be funded by penalty escrow account, closure trust fund, and operating revenues)

* Based on Proteco's 6/3/92 letter from Steve Gordon to Amy Chester, Proteco proposed to contribute over \$900,000 of its own fund to close its hazardous waste units (\$300,000 over the first 12 months for drum removal and \$600,000 for remaining closure activities), in addition to paying the penalty.

Closure Scenarios

Scenario #1: See Diagram #1 and Chart #1. This is an expedited closure process. It will take 31 months to close all RCRA units.

According to Chart #1, the funding for Step #1, the drum removal, would be depleted by May 1993. In closing the rest of the units (plus the removal of the remaining drums), it is estimated that all available funding will be depleted by the end of December 1994. This is approximately 7 months short of completion of closure. An additional \$778,000 is needed to complete closure of the remaining units.

Scenario #2: See Diagram #2 and Chart #2. This is a more flexible closure schedule. This scenario allows 48 months to close all RCRA units. The time to complete Step #1 (Drum Removal) is extended an additional 12 months (from Scenario #1) and the time to complete Step #3 (closure of the remaining units) is 31 months. Based on Chart #2, the funds will be available to complete closure by the end of February 1997.

Notes:

- ° This analysis does not include operating revenue accumulated prior to October 1992.
- ° After October 1993 (when the new municipal landfill requirements become effective), Proteco expects its monthly operating revenue to be significantly greater, allowing Proteco to contribute \$600,000 for closure. This contribution is reflected in Scenario #1. However, in Scenario #2, we assume that Proteco will be able to contribute more than \$600,000--i.e., Proteco will be able to continue to contribute \$39,470 per month until closure is complete.
- ° The assumed closure cost estimate does not take into account discounts for using Proteco's own equipment, on-site fill material, and labor. (Proteco will be able to use fill material from its own facility if it meets the specifications for fill material.)
- ° The CAMU (corrective action management unit) Concept portion of the Subpart S Rule will be final by January 1993. This will allow further flexibility in managing contaminated soil, thereby, lowering closure cost.

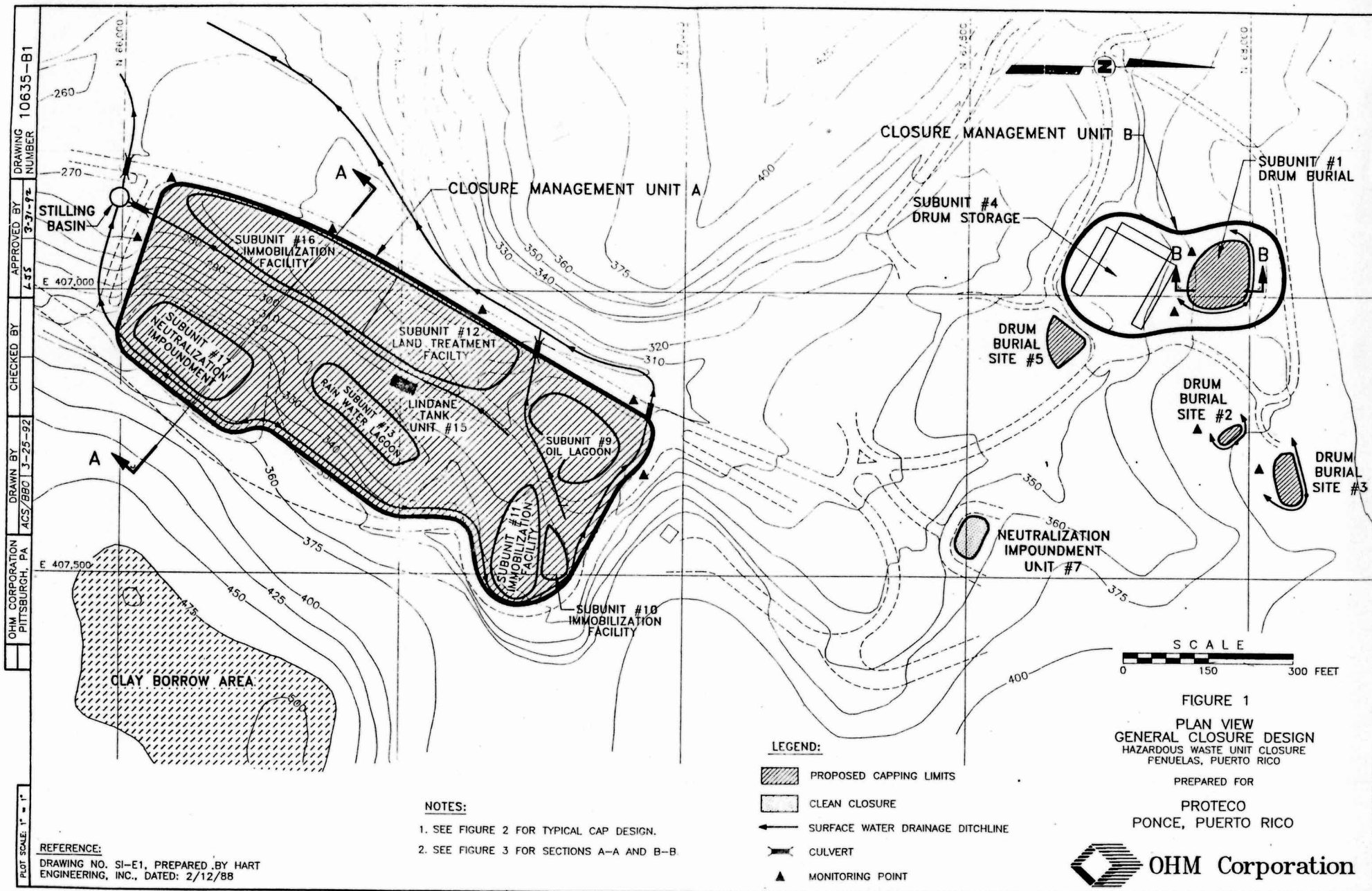


CHART #1--SCENARIO #1

MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
10/92	OPERATION REVENUE	\$5,000	\$0	\$5,015
	PENALTY ESCROW	\$529,700	\$0	\$531,289
	TRUST FUND	\$268,000	\$0	\$268,804
	TOTAL		\$0	\$805,108
11/92	OPERATION REVENUE	\$5,000	\$0	\$10,045
	PENALTY ESCROW	\$20,470	\$0	\$553,414
	TRUST FUND	\$0	\$0	\$269,610
	TOTAL		\$0	\$833,070
12/92	OPERATION REVENUE	\$25,000	\$0	\$35,150
	PENALTY ESCROW	\$0	\$0	\$555,075
	TRUST FUND	\$0	\$0	\$270,419
	TOTAL		\$0	\$860,644
1/93	OPERATION REVENUE	\$25,000	\$10,000	\$50,301
	PENALTY ESCROW	\$0	\$0	\$556,740
	TRUST FUND	\$0	\$0	\$271,231
	TOTAL		\$0	\$878,271
2/93	OPERATION REVENUE	\$25,000	\$10,000	\$65,497
	PENALTY ESCROW	\$0	\$0	\$558,410
	TRUST FUND	\$0	\$0	\$272,044
	TOTAL		\$0	\$895,951
3/93	OPERATION REVENUE	\$25,000	\$48,000	\$42,624
	PENALTY ESCROW	\$0	\$0	\$560,085
	TRUST FUND	\$0	\$0	\$272,860
	TOTAL		\$0	\$875,570
4/93	OPERATION REVENUE	\$25,000	\$48,000	\$19,683
	PENALTY ESCROW	\$0	\$0	\$561,766
	TRUST FUND	\$0	\$0	\$273,679
	TOTAL		\$0	\$855,127
5/93	OPERATION REVENUE	\$25,000	\$48,000	(\$3,327)
	PENALTY ESCROW	\$0	\$0	\$563,451
	TRUST FUND	\$0	\$0	\$274,500
	TOTAL		\$0	\$834,624
6/93	OPERATION REVENUE	\$25,000	\$48,000	(\$26,406)
	PENALTY ESCROW	\$0	\$0	\$565,141
	TRUST FUND	\$0	\$0	\$275,323
	TOTAL		\$0	\$814,059
7/93	OPERATION REVENUE	\$25,000	\$48,000	(\$49,554)
	PENALTY ESCROW	\$0	\$0	\$566,837
	TRUST FUND	\$0	\$0	\$276,149
	TOTAL		\$0	\$793,432

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MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
8/93	OPERATION REVENUE	\$25,000	\$48,000	(\$72,772)
	PENALTY ESCROW	\$0	\$0	\$568,537
	TRUST FUND	\$0	\$0	\$276,978
	TOTAL		\$0	\$772,743
9/93	OPERATION REVENUE	\$25,000	\$48,000	(\$96,059)
	PENALTY ESCROW	\$0	\$0	\$570,243
	TRUST FUND	\$0	\$0	\$277,809
	TOTAL		\$0	\$751,992
10/93	OPERATION REVENUE	\$39,470	\$48,000	(\$104,903)
	PENALTY ESCROW	\$0	\$23,550	\$548,333
	TRUST FUND	\$0	\$0	\$278,642
	TOTAL		\$0	\$722,072
11/93	OPERATION REVENUE	\$39,470	\$48,000	(\$113,773)
	PENALTY ESCROW	\$0	\$23,550	\$526,357
	TRUST FUND	\$0	\$0	\$279,478
	TOTAL		\$0	\$692,062
12/93	OPERATION REVENUE	\$39,470	\$48,000	(\$122,670)
	PENALTY ESCROW	\$0	\$23,550	\$504,316
	TRUST FUND	\$0	\$0	\$280,317
	TOTAL		\$0	\$661,962
1/94	OPERATION REVENUE	\$19,000	\$0	(\$103,981)
	PENALTY ESCROW	\$20,470	\$23,550	\$502,739
	TRUST FUND	\$0	\$0	\$281,15
	TOTAL		\$0	\$679,916
2/94	OPERATION REVENUE	\$19,000	\$0	(\$85,236)
	PENALTY ESCROW	\$20,470	\$23,550	\$501,158
	TRUST FUND	\$0	\$0	\$282,001
	TOTAL		\$0	\$697,923
3/94	OPERATION REVENUE	\$19,000	\$0	(\$66,435)
	PENALTY ESCROW	\$20,470	\$23,550	\$499,573
	TRUST FUND	\$0	\$0	\$282,847
	TOTAL		\$0	\$715,985
4/94	OPERATION REVENUE	\$19,000	\$0	(\$47,577)
	PENALTY ESCROW	\$20,470	\$44,320	\$477,150
	TRUST FUND	\$0	\$0	\$283,696
	TOTAL		\$0	\$713,268
5/94	OPERATION REVENUE	\$19,000	\$0	(\$28,663)
	PENALTY ESCROW	\$20,470	\$44,320	\$454,660
	TRUST FUND	\$0	\$0	\$284,547
	TOTAL		\$0	\$710,543

MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
6/94	OPERATION REVENUE	\$19,000	\$0	(\$9,692)
	PENALTY ESCROW	\$20,470	\$44,320	\$432,102
	TRUST FUND	\$0	\$0	\$285,400
	TOTAL		\$0	\$707,810
7/94	OPERATION REVENUE	\$19,000	\$0	\$9,336
	PENALTY ESCROW	\$20,470	\$0	\$453,930
	TRUST FUND	\$0	\$0	\$286,256
	TOTAL		\$170,770	\$578,752*
At this point on, all funds can be used for closure. **				
8/94	OPERATION REVENUE	\$19,000	\$0	
	PENALTY ESCROW	\$20,470	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$170,770	\$449,307
9/94	OPERATION REVENUE	\$19,000	\$0	
	PENALTY ESCROW	\$20,470	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$170,770	\$319,473
10/94	OPERATION REVENUE	\$19,000	\$0	
	PENALTY ESCROW	\$20,470	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$170,770	\$189,250
11/94	OPERATION REVENUE	\$23,530	\$0	
	PENALTY ESCROW	\$15,940	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$170,770	\$58,636
12/94	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$150,000	(\$51,599)
1/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$150,000	(\$162,166)
2/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$150,000	
3/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$150,000	

**** From this point on, all funds can be used for closure. ****

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MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
4/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$150,000	
5/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$150,000	
6/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$150,000	
7/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$0	

CHART #2--SCENARIO #2

MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
10/92	OPERATION REVENUE	\$5,000	\$0	\$5,015
	PENALTY ESCROW	\$529,700	\$0	\$531,289
	TRUST FUND	\$268,000	\$0	\$268,804
	TOTAL		\$0	\$805,108
11/92	OPERATION REVENUE	\$5,000	\$0	\$10,045
	PENALTY ESCROW	\$20,470	\$0	\$553,414
	TRUST FUND	\$0	\$0	\$269,610
	TOTAL		\$0	\$833,070
12/92	OPERATION REVENUE	\$25,000	\$0	\$35,150
	PENALTY ESCROW	\$0	\$0	\$555,075
	TRUST FUND	\$0	\$0	\$270,419
	TOTAL		\$0	\$860,644
1/93	OPERATION REVENUE	\$25,000	\$10,000	\$50,301
	PENALTY ESCROW	\$0	\$0	\$556,740
	TRUST FUND	\$0	\$0	\$271,231
	TOTAL		\$0	\$878,271
2/93	OPERATION REVENUE	\$25,000	\$10,000	\$65,497
	PENALTY ESCROW	\$0	\$0	\$558,410
	TRUST FUND	\$0	\$0	\$272,044
	TOTAL		\$0	\$895,951
3/93	OPERATION REVENUE	\$25,000	\$22,000	\$68,702
	PENALTY ESCROW	\$0	\$0	\$560,085
	TRUST FUND	\$0	\$0	\$272,860
	TOTAL		\$0	\$901,648
4/93	OPERATION REVENUE	\$25,000	\$22,000	\$71,917
	PENALTY ESCROW	\$0	\$0	\$561,766
	TRUST FUND	\$0	\$0	\$273,679
	TOTAL		\$0	\$907,362
5/93	OPERATION REVENUE	\$25,000	\$22,000	\$75,142
	PENALTY ESCROW	\$0	\$0	\$563,451
	TRUST FUND	\$0	\$0	\$274,500
	TOTAL		\$0	\$913,093
6/93	OPERATION REVENUE	\$25,000	\$22,000	\$78,376
	PENALTY ESCROW	\$0	\$0	\$565,141
	TRUST FUND	\$0	\$0	\$275,323
	TOTAL		\$0	\$918,841
7/93	OPERATION REVENUE	\$25,000	\$22,000	\$81,620
	PENALTY ESCROW	\$0	\$0	\$566,837
	TRUST FUND	\$0	\$0	\$276,149
	TOTAL		\$0	\$924,606

MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
8/93	OPERATION REVENUE	\$25,000	\$22,000	\$84,874
	PENALTY ESCROW	\$0	\$0	\$568,537
	TRUST FUND	\$0	\$0	\$276,978
	TOTAL		\$0	\$930,389
9/93	OPERATION REVENUE	\$25,000	\$22,000	\$88,138
	PENALTY ESCROW	\$0	\$0	\$570,243
	TRUST FUND	\$0	\$0	\$277,809
	TOTAL		\$0	\$936,189
10/93	OPERATION REVENUE	\$39,470	\$22,000	\$105,925
	PENALTY ESCROW	\$0	\$23,550	\$548,333
	TRUST FUND	\$0	\$0	\$278,642
	TOTAL		\$0	\$932,900
11/93	OPERATION REVENUE	\$39,470	\$22,000	\$123,765
	PENALTY ESCROW	\$0	\$23,550	\$526,357
	TRUST FUND	\$0	\$0	\$279,478
	TOTAL		\$0	\$929,600
12/93	OPERATION REVENUE	\$39,470	\$22,000	\$141,659
	PENALTY ESCROW	\$0	\$23,550	\$504,316
	TRUST FUND	\$0	\$0	\$280,317
	TOTAL		\$0	\$926,291
1/94	OPERATION REVENUE	\$19,000	\$22,000	\$139,075
	PENALTY ESCROW	\$20,470	\$23,550	\$502,739
	TRUST FUND	\$0	\$0	\$281,158
	TOTAL		\$0	\$922,971
2/94	OPERATION REVENUE	\$19,000	\$22,000	\$136,483
	PENALTY ESCROW	\$20,470	\$23,550	\$501,158
	TRUST FUND	\$0	\$0	\$282,001
	TOTAL		\$0	\$919,642
3/94	OPERATION REVENUE	\$19,000	\$22,000	\$133,883
	PENALTY ESCROW	\$20,470	\$23,550	\$499,573
	TRUST FUND	\$0	\$0	\$282,847
	TOTAL		\$0	\$916,303
4/94	OPERATION REVENUE	\$19,000	\$22,000	\$131,276
	PENALTY ESCROW	\$20,470	\$23,550	\$497,982
	TRUST FUND	\$0	\$0	\$283,696
	TOTAL		\$0	\$912,953
5/94	OPERATION REVENUE	\$19,000	\$22,000	\$128,661
	PENALTY ESCROW	\$20,470	\$23,550	\$496,387
	TRUST FUND	\$0	\$0	\$284,547
	TOTAL		\$0	\$909,594

MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
6/94	OPERATION REVENUE	\$19,000	\$22,000	\$126,038
	PENALTY ESCROW	\$20,470	\$23,550	\$494,787
	TRUST FUND	\$0	\$0	\$285,400
	TOTAL		\$0	\$906,225
7/94	OPERATION REVENUE	\$19,000	\$22,000	\$123,407
	PENALTY ESCROW	\$20,470	\$0	\$516,802
	TRUST FUND	\$0	\$0	\$286,256
	TOTAL		\$66,233	\$860,233
** From this point on, all funds will be used for closure. **				
8/94	OPERATION REVENUE	\$19,000	\$22,000	
	PENALTY ESCROW	\$20,470	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$88,233	\$814,169
9/94	OPERATION REVENUE	\$19,000	\$22,000	
	PENALTY ESCROW	\$20,470	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$88,233	\$767,967
10/94	OPERATION REVENUE	\$19,000	\$22,000	
	PENALTY ESCROW	\$20,470	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$88,233	\$721,626
11/94	OPERATION REVENUE	\$23,530	\$22,000	
	PENALTY ESCROW	\$15,940	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$88,233	\$675,146
12/94	OPERATION REVENUE	\$39,470	\$22,000	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$88,233	\$628,527
1/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$603,768
2/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$578,935
3/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$554,027

MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
4/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$529,045
5/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$503,987
6/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$478,855
7/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$453,646
8/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$428,363
9/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$403,003
10/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$377,568
11/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$352,056
12/95	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$326,467
1/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$300,802

MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
2/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$275,060
3/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$249,241
4/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$223,344
5/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$197,369
6/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$171,317
7/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$145,186
8/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$118,977
9/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$92,689
10/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$66,323
11/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$39,877

MONTH	ACCOUNT	CREDIT	DEBIT	BALANCE
12/96	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	\$13,352
1/97	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$66,233	(\$13,252)
2/97	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$0	\$26,296
3/97	OPERATION REVENUE	\$39,470	\$0	
	PENALTY ESCROW	\$0	\$0	
	TRUST FUND	\$0	\$0	
	TOTAL		\$0	\$65,964

Diagram 1. PROTECO--Closure Schedule and Funding (Scenario #1--Expedited Closure)

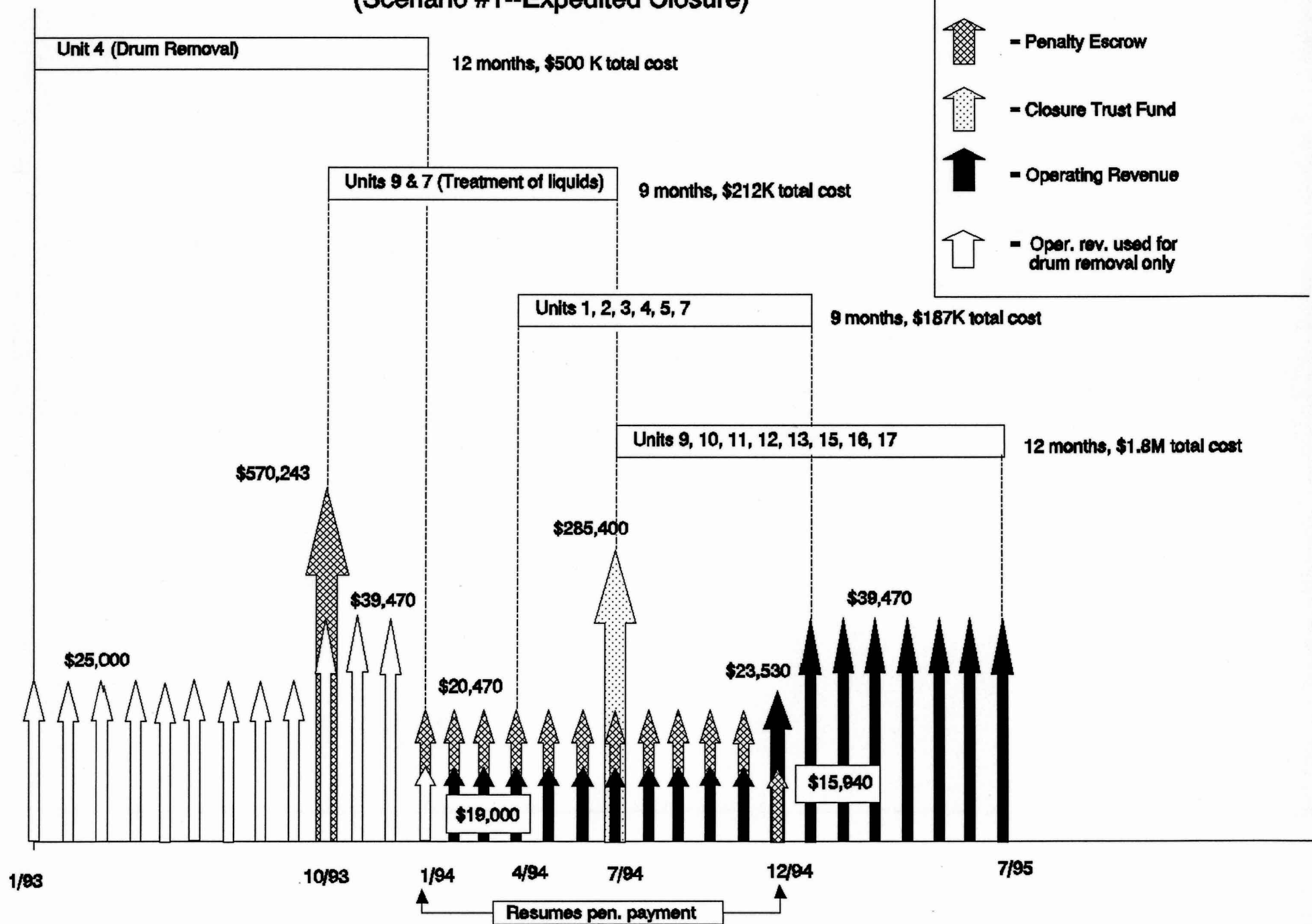


Diagram 2. PROTECO--Closure Schedule and Funding
 (Scenario #2--Flexible Closure)

